

**UNITED STATES BANKRUPTCY COURT**  
**Northern District of California**

In re:	)	Bankruptcy No.: 19-30088 (DM)
	)	R.S. No.:
PG&E CORPORATION	)	Hearing Date: December 17, 2019
	)	Time: 10:00 a.m. (PST)
-and-	)	
	)	
PACIFIC GAS AND ELECTRIC COMPANY	)	
	)	
Debtors	)	
_____	)	

**Relief From Stay Cover Sheet**

Instructions: Complete caption and Section A for all motions. Complete Section B for mobile homes, motor vehicles, and personal property. Complete Section C for real property. Utilize Section C as necessary. If moving party is not a secured creditor, briefly summarize the nature of the motion in Section D.

- (A) Date Petition Filed: January 29, 2019 Chapter: 11  
Prior hearings on this obligation: None Last Day to File §523/§727 Complaints: \_\_\_\_\_
- (B) Description of personal property collateral (e.g. 1983 Ford Taurus):  
  
Secured Creditor ☐ or lessor ☐  
Fair market value: \$ \_\_\_\_\_ Source of value: \_\_\_\_\_  
Contract Balance: \$ \_\_\_\_\_ Pre-Petition Default: \$ \_\_\_\_\_  
Monthly Payment: \$ \_\_\_\_\_ No. of months: \_\_\_\_\_  
Insurance Advance: \$ \_\_\_\_\_ Post-Petition Default: \$ \_\_\_\_\_  
No. of months: \_\_\_\_\_
- (C) Description of real property collateral (e.g. Single family residence, Oakland, CA):  
  
Fair market value: \$ \_\_\_\_\_ Source of value: \_\_\_\_\_ If appraisal, date: \_\_\_\_\_  
  
Moving Party's position (first trust deed, second, abstract, etc.):  
  
Approx. Bal. \$ \_\_\_\_\_ Pre-Petition Default: \$ \_\_\_\_\_  
As of (date): \_\_\_\_\_ No. of months: \_\_\_\_\_  
Mo. payment: \$ \_\_\_\_\_ Post-Petition Default: \$ \_\_\_\_\_  
Notice of Default (date): \_\_\_\_\_ No. of months: \_\_\_\_\_  
Notice of Trustee's Sale: \_\_\_\_\_ Advances Senior Liens: \$ \_\_\_\_\_

Specify name and status of other liens and encumbrances, if known (e.g. trust deeds, tax liens, etc.):

Position	Amount	Mo. Payment	Defaults
1 <sup>st</sup> Trust Deed: _____	\$ _____	\$ _____	\$ _____
2 <sup>nd</sup> Trust Deed: _____	\$ _____	\$ _____	\$ _____
(Total)	\$ _____	\$ _____	\$ _____

- (D) Other pertinent information: This motion seeks to modify the automatic stay to permit Movant to exercise its contractual right to terminate an agreement to which Pacific Gas and Electric Company is a counterparty.

Dated: November 22, 2019

MORGAN LEWIS & BOCKIUS, LLP

By: /s/ Richard W. Esterkin  
Richard W. Esterkin (SBN 70769)

Attorneys for Henrietta D Energy Storage LLC